

ORIGINAL

Before The
Federal Communications Commission
Washington, DC

RECEIVED

November 16, 1999

NOV 16 1999

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of

Telecommunications Relay Services
And Speech-to-Speech Services
For Individuals with
Hearing and Speech Disabilities

EX PARTE OR LATE FILED

CC Docket No. 98-67

Exparte Comments of the
Wisconsin Department of Administration

On February 1st of this year (1999), it was necessary for the WI TRS to change vendors. The lack of information carried over from the former provider to the new provider made the first several months of the transition unnecessarily troublesome for relay users. The out-going provider refused to pass on the user profile information to the incoming provider on grounds of CPNI. Unfortunately the timing could not have been worse, as there was also a vacancy in the TRS Contract Administrator post. With no clarifications from the FCC, each vendor had only their individual arguments to stand on. The out-going vendor prevailed, leaving the new vendor to start from 'scratch'. Of course, this action did not limit inconvenience to the new provider; rather, it extended it to each TRS customer who had any type of pre-selected information on record with WI TRS.

Instead of being able to focus on getting the word out to customers about the new features brought in with the new vendor, months of effort was spent informing customers that they must personally make a new user profile by either writing or calling the new provider. Specifically, the information referred to includes:

Long Distance Carrier of Choice

Blocking Preferences

Speed Dial Numbers

No. of Copies rec'd
List ABCDE

OH

Calling Card Numbers and directions

Special Needs Information – ie typing slowly for customers with low vision

VCO, HCO, 2LVCO, VTV, connect options

ASCII Connection Settings

Personal Introductory Statements

Specific instructions to CA's to follow on every call

Self-Learning functions such as connect speeds/types (baudot, ASCII, spell checking, etc)

Emergency Numbers

If the above types of information HAD been provided to the incoming (new) provider, many customers would have been saved confusion, aggravation and unexpected cost. Customers blamed the new vendor for their hardships yet, it was not within the new vendor's control. In no way, shape or form, would the provision of the above mentioned types of information have been used for marketing. It would have been used to transition to a new provider. The type of customer information that is in question is vital to citizens whom depend upon relay for continuous and uninterrupted telephone access.

The problem of information being withheld effects ALL relay users, not solely those with hearing and speech disabilities. For example, in Wisconsin, thousands of WTRS relay "cards" had been distributed to 'hearing' relay users who do business with, or for whatever reason, regularly communicate via TRS with TTY users. The database of information including all of the phone numbers of the voice-originated callers was not provided to the new vendor. The access number for the voice originated TRS calls changed when the vendors changed. Thousands of callers had no idea the access number had changed, however, and tried to find out what happened by calling directory assistance and/or relay customer service. Directory assistance still does not provide consistent relay number information. This

is a problem that we strongly desire Commission attention to in the near future. Relay Customer Service was inundated with angry and confused people wanting to know what happened to the voice access number! It was quite a challenging and frustrating start for a new vendor and customers.

Arguably, all of the connect types, caller preferences, billing preferences and functions listed under the “Profile Information” examples, each either directly or indirectly, make it possible for the relay provider to initiate, render, bill, or generally provide the telecommunications service from which that information is derived and used in the provision of said service. In no way does the sharing of information mentioned between TRS providers involve or facilitate fraudulent, abusive, or unlawful use of customer information.

In order to ensure that TRS is available, to the extent possible in the most efficient manner, (as stated in Title IV) TRS providers MUST be required to disclose such aforementioned customer information at least 60 days prior to their last day of service provision. The customer information should be considered property of the customer as stated in Exparte Comments of Maryland, Minnesota, and Wisconsin filed on November 16, 1999¹, not the relay provider. Further, Wisconsin proposes at a minimum, the raw data (not necessarily the potentially, proprietary formatted databases) of customer information be provided to the State entity responsible for relay oversight in order to prevent vendor to vendor disputes.

In reference to Carrier of Choice Wisconsin also urges the Commission to establish an Industry Team (similar to the Coin Sent Paid one). This team would address the issue of carriers working with the relays in order to establish a point of presence at the tandems relay calls travel through; or to develop a

¹ Exparte Comments of the Maryland Department of Budget and Management, Minnesota Relay, Service, and Wisconsin Relay Service Page 4 I

standard method for making access available to reach their systems dial tone via relay. Telephone Associations, Local Exchange Companies, Interexchange Carriers and Relay Providers as well as State Administrators must dialogue regarding this issue in order to make TRS equally accessible to all customers. Customers who use the more "traditional" carriers and services and those who prefer to use "dial - around" (10-10-XXX), also need the "pass through" functionality that standard telephone network customers have had access to for years (ie pass through of LEC chosen blocks, 900 and pay per service calls and optional and/or extended calling plans.

Wisconsin urges the FCC to act with all due speed and diligence to resolve these matters to insure seamless relay provider transitions and equitable calling options for ALL telecommunications network users.

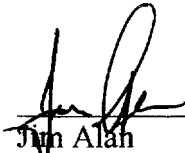
Respectfully Submitted,

Stephen Bull WI Relay Contract Admin

Maryland Department of Budget (Maryland Relay) and the State of Minnesota, Department of Commerce (Minnesota Relay) are in concurrence and support the Exparte Comments submitted on November 16, 1999, by the Wisconsin Department of Administration regarding FCC Docket No. 98-67.



Gilbert Becker, Director
Telecommunications Access of Maryland
Maryland Relay



Jim Alan
TACIP Administrator
Minnesota Relay